

### REMARKS

Claims 1-28 are pending in the application.

Claims 1-28 have been rejected.

Claims 1, 10, 13, and 22 have been amended.

#### Formal Matters

Appreciation is expressed for the telephonic interview conducted on March 25, 2009 between Examiner Danneman and Shawn Doman (Reg. No. 60,362). During the interview, the Knauss reference was discussed with reference to independent claims 1 and the § 101 rejection of claims 10-11 was discussed. The undersigned believes this paper is in harmony with the positions expressed during the interview.

#### Rejection of Claims under 35 U.S.C. § 101

Claims 10, 11 and 12 stand rejected under 35 U.S.C. § 101 because the claimed invention is purportedly directed to non-statutory subject matter. Applicants respectfully traverse this rejection. The Office Action states that the claimed data structure does not produce a useful, concrete, and tangible result. Applicants respectfully disagree and submit that the data structure produces a common invoice adjustment data object format. The common invoice adjustment data object format is a useful concrete and tangible result. The data structure produces the common invoice adjustment data object format, at least in part, by translating invoice adjustment information.

During the above-mentioned interview, the Examiner suggested amending claim 10 to include executable code. Applicants have carefully considered MPEP 2106.01 and respectfully submit that the claimed data structure falls, at worst, under the given definition of functional descriptive material, which “consists of data structures and computer programs which impart functionality when employed as a computer component.” MPEP § 2106.01. As noted in the MPEP, “when functional descriptive material is recorded on some computer-readable medium, it becomes structurally and functionally interrelated to the medium and will be statutory in most cases since use of

technology permits the function of the descriptive material to be realized.” *Id.* Applicants respectfully submit that claim 10 is thus statutory since claim 10 recites a data structure having a function of translate invoice adjustment information into a common invoice adjustment data object format and the data structure is recorded on a machine readable medium. For at least the foregoing reasons, Applicants respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

*Rejection of Claims under 35 U.S.C. § 103(a)*

Claims 1-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 7,043,687 B2 issued to Knauss et al. (“Knauss”). Applicants respectfully traverse this rejection. Applicants respectfully submit that the cited portions of Knauss fail to disclose each feature of independent claim 1, which has been amended to recite:

A method comprising:

receiving invoice adjustment information in an application-specific data object format from each of a plurality of processing systems, wherein each processing system comprises an application, the invoice adjustment information is received at a transport layer, and the invoice adjustment information comprises  
an identification data element;  
invoice adjustment base data element;  
a billing data element;  
a status data element; and  
a list of invoice adjustment line item details data element;

receiving configuration information relating to the processing systems at the transport layer, wherein the configuration information is received via an adapter; and

translating the invoice adjustment information into a common invoice adjustment data object format, wherein

the translating is performed by a processor, and  
the translating comprises:

accessing a first storing unit configured to store transformation information, wherein the first storing unit is coupled to the processor,

accessing a second storing unit configured to store defined business processes, wherein the second storing unit is coupled to the processor,

using a business process controller configured to execute the business processes, wherein the execution is in response to predefined events, and the common invoice adjustment data object format comprises at least one custom data element, and the custom data element is configured to allow customization of the common invoice adjustment data object format.

For example, Applicants respectfully submit that the cited portions of Knauss fail to disclose, at least, “the common invoice adjustment data object format comprises at least one custom data element, and the custom data element is configured to allow customization of the common invoice adjustment data object format.” Support for these amendments is found, at least, at ¶ [0040] of the Specification.

As noted in Applicants’ Specification, and as discussed in the above-mentioned interview, customizability is a problem in previous efforts made to define standard data models. *See, e.g.*, Specification, ¶ [0007]. The amendments made to claim 1 further illustrate the features provided by the claimed method to address problems of customizability. This is demonstrated, at least, by inclusion of one or more custom data elements that allow customization of the data object format. In a contrary approach, Knauss explicitly teaches that in order for Knauss’s system to accommodate changes in a document, a new mapping must be created. *See* Knauss 8:38-46. Applicants respectfully submit that the cited portions of Knauss fail to disclose custom data elements configured to allow customization of the common data object format.

Applicants respectfully submit that the remarks made above with regard to claim 1 apply with equal force to independent claims 10, 13, and 22 (which have been amended to include similar features. For at least the foregoing reasons, Applicants respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims, as well as all claims that depend therefrom, and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



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